

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE GOOGLE INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION**

Case No. 12-MD-2358 (SLR)

**This Document Relates to:
All Actions**

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF SETTLEMENT
WITH GOOGLE INC.**

TO DEFENDANTS AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs Jose M. (“Josh”) Bermudez, Nicholas Todd Heinrich, and Lynne Krause (collectively “Plaintiffs” or “Class Representatives”) respectfully move the Court for an Order finally approving the Settlement reached with Defendant Google Inc. (“Google”). Plaintiffs file this motion pursuant to Federal Rule of Civil Procedure 23, on the grounds that the requirements for final approval are met, and the proposed Settlement is fair, reasonable, and adequate. On August 31, 2016, this Court granted preliminary approval of the Settlement, certified a Settlement Class, appointed Settlement Class Counsel, and directed that notice of the Settlement be issued. Plaintiffs now seek the Court’s Order finding that the settlement is fair, reasonable, and adequate and granting final approval.

Dated: December 7, 2016

Respectfully submitted,

**SILVERMAN THOMPSON SLUTKIN
WHITE**

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LOCAL RULE 7.1.1 STATEMENT

No party to the proposed Settlement opposes the relief sought in this Motion.

Dated: December 7, 2016

/s/ Brian R. Strange
Brian R. Strange